UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

MICHELLE TREBITSCH, On behalf of herself and all others similarly situated,) Civ. Action No. 04-10307 DPW
Plaintiff,)
v.)
SONUS NETWORKS, INC., HASSAN AHMED, PH.D. AND STEPHEN NILL,))
Defendants.)))

STIPULATION AS TO ACCEPTANCE OF SERVICE AND SCHEDULING

WHEREAS, on February 12, 2004, plaintiff Michelle Trebitsch filed Michelle Trebitsch, On Behalf of Herself and All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, and Stephen J. Nill, Civil Action No. 04-10307, DPW (D. Mass.) (the "Trebitsch" Complaint"), a putative class action complaint alleging securities fraud under the Exchange Act; and

WHEREAS, Plaintiff intends to file a motion to consolidate the Trebitsch Complaint with all other existing similar actions and later-filed similar actions, and pursuant to the Private Securities Litigation Reform Act of 1995 (the "Reform Act"), intends to move for the appointment of a Lead Plaintiff and approval of the retention of Lead Plaintiff's counsel;

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¹ A current list of these existing and later-filed similar actions is attached as Exhibit A hereto.

Filed 03/19/2004

that:

THEREFORE IT IS HEREBY STIPULATED AND AGREED by the parties

- 1. Service of the Trebitsch Complaint is accepted by each of the undersigned defendants, as of the date hereof or the date of personal service upon the defendants whichever is earlier;
- 2. Defendants need not respond to the Trebitsch Complaint, but shall respond to an Amended Consolidated Complaint no later than 45 days after such Amended Consolidated Complaint is served upon Defendants by the Lead Plaintiff, to be appointed by the Court in order to consolidate the Trebitsch Complaint with all other existing similar actions and later-filed similar actions in accordance with Section 21D(a)(3) of the Securities Exchange Act of 1934. In the event that the Motion to Consolidate is denied, Defendants shall respond to the Trebitsch Complaint no later than 45 days after such denial;
- 3. In the event that any deadline herein falls on a weekend or holiday, that deadline shall be extended to following business day; and

4. After appointment of a Lead Plaintiff pursuant to the Reform Act, service on lead counsel for such plaintiff shall satisfy Defendants' service obligations.

MICHELLE TREBITSCH, On Behalf of Herself and All Others Similarly Situated,

By her attorneys,

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Michael T Matroia (BBO# 632040

Michael T Matraia (BBO# 633049) Shannon L. Hopkins (BBO# 657485)

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SONUS NETWORKS, INC.

By their attorneys,

effrey B. Rudman (BBO# 433380)

James W. Prendergast (BBO# 553073)

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HASSAN AHMED, PH.D.

By his attorneys,

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STEPHEN J. NILL

By his attorneys,

Thomas J. Dougherty (BBO# 132300) Matthew J. Matule (BBO# 632075)

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Boston, MA 02108-3194

(617) 573-4800

Dated: March 18, 2004

CENTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was erves upon the attorney of sepon

EXHIBIT A

- Deborah Chin, Individually and On Behalf of All Others Similarly Situated v. Sonus 1. Networks, Inc., Hassan Ahmed, PH.D., Stephen Nill, C.A. No. 04-10294, DPW (D. Mass.)
- 2. Richard Curtis, Individually and On Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan Ahmed, PH.D., and Stephen Nill, C.A. No. 04-10314, MLW (D. Mass.)
- 3. Samantha Den, Individually and On Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan H. Ahmed, Stephen J. Nill, C.A. No. 04-10310, DPW (D. Mass.)
- Peter Kaltman, On Behalf of Himself and All Others Similarly Situated v. Sonus 4. Networks, Inc., Ruben Gruber, Hassan Ahmed and Stephen Nill, C.A. No. 04-10309, DPW (D. Mass.)
- 5. Information Dynamics, LLC, On Behalf of Itself and All Others Similarly Situated v. Sonus Networks, Inc., Paul R. Jones, Edward N. Harris, J. Michael O'Hara, Hassan M. Ahmed and Stephen J. Nill, CA. No. 04-10308, DPW (D. Mass.)
- Michelle Trebitsch, On Behalf Of Herself and All Others Similarly Situated v. Sonus 6. Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. 04-10307, DPW (D. Mass.)
- 7. Steve L. Baker, Individually and On Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. 04-10332, DPW (D. Mass.)
- 8. Haiming Hu, Individually and On Behalf Of All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. No. 04-10346, DPW (D. Mass.)
- 9. Samuel Ho, Individually and On Behalf Of All Others Similarly Situated v. Sonus Networks, Inc, Hassan M. Ahmed, Stephen J. Nill, C.A. No. 04-10363, DPW (D. Mass.)
- 10. Ronald Kassover, On Behalf of The Ronald Kassover IRA and All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. No. 04-10329, DPW (D. Mass.)
- 11. Michael Kaffee, Individually and On Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. 04-10345, DPW (D. Mass.)

- 12. Wheaton Electrical Services Retirement 401K Profit Sharing Plan, On Behalf of Itself and All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. No. 04-10383, DPW (D. Mass.)
- 13. Charles Starbuck, Individually and On Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan Ahmed, PH.D., Stephen Nill, C.A. No. 04-10362, DPW (D. Mass.)
- 14. Robert Conte and Mark Respler, Themselves and On Behalf of All Others Similarly Situated v. Sonus, Hassan Ahmed, PH.D., Stephen Nill, C.A. No. 04-10382, DPW (D. Mass.)
- 15. Jeffrey C. Rodrigues, Individually and on Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. No. 04-10364, DPW (D. Mass.)
- 16. Brian Clark, Individually and on Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Paul R. Jones, J. Michael O'Hara, Hassan M. Ahmed and Stephen J. Nill, C.A. No. 04-10454, DPW (D. Mass.)